

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

---

	:	
<b>IN RE:</b>	:	<b>BK. NO. 23-00266-MJC</b>
Charlotte D. Martin a/k/a Charlotte	:	
D. Mighton, a/k/a Charlotte D. Dunn, a/k/a	:	<b>CHAPTER 13</b>
Charlotte D. Cariffe, a/k/a Charlotte D.	:	
Dalmanieras	:	
	Debtor(s)	:
		:
Deutsche Bank National Trust Company,	:	
as Indenture Trustee, for New Century	:	
Home Equity Loan Trust 2006-2	:	
	Movant	:
	v.	:
Charlotte D. Martin a/k/a Charlotte D.	:	
Mighton, a/k/a Charlotte D. Dunn, a/k/a	:	
Charlotte D. Cariffe, a/k/a Charlotte D.	:	
Dalmanieras	:	
	Debtor(s)	:
	and	:
Jack N. Zaharopoulos	:	
	Trustee	:
		:
		:

---

**AMENDED DEBTOR'S RESPONSE TO CREDITOR'S MOTION FOR RELIEF FROM  
THE AUTOMATIC STAY**

Debtor-Respondents, Charlotte D. Martin (Hereafter "Debtor"), responds to the motion of Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2006-2 (hereinafter the "Creditor"), as follow:

1. Admitted.
2. Admitted.
3. Admitted.

4. Admitted
5. Admitted.
6. Admitted in part, Denied in part. The Debtor has no knowledge as to the Creditor's possession of the promissory note.
7. Denied. The Debtor's husband paid the loan in full via wire transfer to the Creditor on June 1, 2023. The confirmation number will be emailed to the Creditor's attorney.
8. Denied. The loan was paid in full on June 1, 2023.
9. Denied as the loan has been paid in full.
10. Admitted.

WHEREFORE, Debtor respectfully requests an Order denying the Trustee's Objection.

Dated: June 5, 2023

BY: /s/ Christopher G. Cassie, Esq.

CHRISTOPHER G. CASSIE, ESQUIRE  
Keaveney Legal Group, LLC  
1000 Maplewood Drive, Suite 202  
Maple Shade, NJ 08052  
Tel. 856.481.2098  
Fax. 856.282.1090  
[ccassie@keaveneylegalgroup.com](mailto:ccassie@keaveneylegalgroup.com)  
Attorney for Debtor